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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,
LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC., *et*
al.

Defendants.

Case No.: 2:23-cv-01049-JWH-KES

[Assigned to the Hon. John W. Holcomb]

**JOINT STIPULATION TO REQUEST
APPOINTMENT OF DAVID
KEYZER, ESQ. AS SPECIAL
MASTER FOR DISCOVERY
PURPOSES**

Related Case: 2:22-cv-07775-JWH-JEM

**JOINT STIPULATION TO REQUEST APPOINTMENT OF DAVID KEYZER,
ESQ. AS SPECIAL MASTER FOR DISCOVERY PURPOSES**

1 Plaintiff Entropic Communications, LLC (“Entropic”) and Defendants Cox
2 Communications, Inc., CoxCom, LLC and Cox Communications California, LLC
3 (“Defendants”) (together with Entropic, the “Parties”) hereby submit the following Joint
4 Stipulation to Request Appointment of David Keyzer, Esq. as special master for
5 discovery purposes in this case.

6 **WHEREAS**, the Court issued an order on April 21, 2023 in this matter directing
7 the parties to meet and confer and file a stipulation proposing an individual for
8 appointment as special master in this matter for the purposes of discovery [ECF 48];

9 **WHEREAS**, the Parties, following meet-and-confer efforts, have agreed that
10 David Keyzer, Esq. is an appropriate candidate for appointment as special master;

11 **WHEREAS**, the Parties contacted Mr. Keyzer for the purposes of requesting a
12 conflicts check for all named parties to these cases;

13 **WHEREAS**, Mr. Keyzer has confirmed, based on the party lists that he checked,
14 that he does not have conflicts with any parties in this matter or the other Entropic
15 matters for which Mr. Keyzer may serve as a special master;

1 **WHEREFORE**, the Parties hereby stipulate to request that the Court issue an
2 order appointing David Keyzer, Esq. as special master for purposes of discovery.

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4 Dated: June 8, 2023

Respectfully Submitted,

5 By: /s/ Christina N. Goodrich

6 Christina N. Goodrich (SBN 261722)

7 Connor J. Meggs (SBN 336159)

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Dated: June 8, 2023

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11 **ATTORNEYS FOR DEFENDANTS COX**
12 **COMMUNICATIONS, INC.; COXCOM,**
13 **LLC; AND COX COMMUNICATIONS**
14 **CALIFORNIA, LLC**

15 **SIGNATURE CERTIFICATION**

16 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Christina N. Goodrich, attest that all
17 other signatories listed above concur in this filing's content and have authorized the
18 filing.

19 /s/ Christina N. Goodrich
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